

1 O'MELVENY & MYERS LLP  
2 Daniel M. Petrocelli, CA Bar No. 97802\*  
3 dpetrocelli@omm.com  
4 David Marroso, CA Bar No. 211655\*  
5 dmarroso@omm.com  
6 Joseph Guzman, CA Bar No. 310493\*  
7 jguzman@omm.com  
8 1999 Avenue of the Stars, 8th Floor  
9 Los Angeles, CA 90067  
10 Phone 310 553-6700  
11 Fax 310 246-6779  
12 \*Admitted pro hac vice

13 HONE LAW  
14 Eric D. Hone, NV Bar No. 8499  
15 ehone@hone.law  
16 Jamie L. Zimmerman, NV Bar No. 11749  
17 jzimmerman@hone.law  
18 701 N. Green Valley Parkway, Suite 200  
19 Henderson, NV 89074  
20 Phone 702-608-3720  
21 Fax 702-703-1063

22 13 Attorneys for Defendant Top Rank, Inc.

23 14 UNITED STATES DISTRICT COURT

24 15 DISTRICT OF NEVADA

25 16 TERENCE CRAWFORD, an individual,

26 Case No. 2:22-cv-00081-APG-EJY

27 17 Plaintiff,

28 18 vs.

29 19 TOP RANK, INC., a Nevada corporation; and  
30 Does 1 through 20, inclusive,  
31 20 Defendants.

32 JOINT STATUS REPORT CONCERNING  
33 REMOVAL

34 22 Plaintiff Terence Crawford (“Crawford”) and Defendant Top Rank, Inc. (“Top Rank”)  
35 (collectively referred to as the “Parties”), by and through their undersigned counsel, respectfully  
36 submit this Joint Status Report Concerning Removal pursuant to the Court’s January 18, 2022  
37 Minutes of the Court [ECF No. 4].

38 26 1. Top Rank filed a Petition of Removal on January 15, 2022 [ECF No. 1].  
39 27 2. On January 18, 2022, the Court entered Minutes of the Court [ECF No. 4]  
40 requiring Top Rank to file a statement regarding removal and serve the Minutes of the Court on



1 all parties within 15 days, as well as requiring the parties to file a status report concerning  
2 removal within 30 days.

3       3. On February 2, 2022, Top Rank filed its Statement Regarding Removal [ECF No.  
4 14].

5       4. Also on February 2, 2022, Top Rank filed a Certificate of Service for Minutes of  
6 the Court [ECF No. 13].

7       5. On February 11, 2022, the Parties filed a Stipulation and [Proposed] Order to  
8 Extend the Time for Top Rank, Inc. to Respond to Complaint, File Counterclaims, File Motions  
9 Pursuant to Federal Rule of Civil Procedure 12, and File Any Special Motions to Dismiss  
10 Pursuant to Nevada’s Anti-SLAPP Statute (the “Stipulation”) [ECF No. 19.]

11       6. The Court entered its Order granting the Stipulation (the “Stipulation and Order”)  
12 [ECF No. 20] on February 11, 2022.

13       7. On February 14, 2022, Crawford filed a Motion for Remand [ECF No. 21]. Top  
14 Rank’s response is due by February 28, 2022, and Crawford’s reply is due by March 7, 2022.

15       8. Pursuant to the Stipulation and Order, Top Rank’s deadline to respond to  
16 Crawford’s complaint, file counterclaims, file motions pursuant to Federal Rule of Civil  
17 Procedure 12, and to file any special motions to dismiss pursuant to Nevada’s Anti-SLAPP  
18 Statute are extended to 14 days after entry of an order by the Court concerning the Motion to  
19 Remand. *See* ECF No. 20, p. 3.

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1       9.      The parties respectfully submit that no further action is required by the Court until  
2 briefing on the Motion to Remand is completed.  
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4 Dated this 17th day of February 2022.

Dated this 17th day of February 2022.

5  
6 */s/ Hector J. Carbajal II*  
7 FREEDMAN + TAITELMAN, LLP  
Bryan J. Freedman, Esq., CA Bar No. 151990\*  
BFreedman@ftllp.com  
8 Brian E. Turnauer, Esq., CA Bar No. 214768\*  
BTurnauer@ftllp.com  
9 1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
10 Phone 310-201-0005  
\*Admitted pro hac vice

11 CARBAJAL LAW  
12 Hector J. Carbajal II, NV Bar No. 6247  
hector@claw.vegas  
13 10001 Park Run Drive  
Las Vegas, Nevada 89145  
14 Phone 702-846-0040

15 *Attorneys for Plaintiff Terence Crawford*

6 */s/ Jamie L. Zimmerman*  
7 O'MELVENY & MYERS LLP  
Daniel M. Petrocelli, CA Bar No. 97802\*  
dpetrocelli@omm.com  
David Marroso, CA Bar No. 211655\*  
dmarroso@omm.com  
Joseph Guzman, CA Bar No. 310493\*  
jguzman@omm.com  
1999 Avenue of the Stars, 8th Floor  
Los Angeles, CA 90067  
Phone 310-553-6700  
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Eric D. Hone, NV Bar No. 8499  
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Jamie L. Zimmerman, NV Bar No. 11749  
jzimmerman@hone.law  
701 N. Green Valley Parkway, Suite 200  
Henderson, NV 89074  
Phone 702-608-3720

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17 *Attorneys for Defendant Top Rank, Inc.*

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